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**From:** Gildea, Jason [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7BDD2640A8C54F198B138F951D8E5D43-GILDEA, JASON]  
**Sent:** 1/23/2020 12:52:21 AM  
**To:** Julien Katchinoff [KatchinoffJM@state.gov]; Kuester, Susanne G [KuesterSG@state.gov]; Geoff G. Reid (reidg@state.gov) [reidg@state.gov]  
**CC:** Schmit, Ayn [Schmit.Ayn@epa.gov]  
**Subject:** FW: Request--Michel Coal Draft AIR for Review and Comment by December 13, 2019  
**Attachments:** Michel Coal Project letter\_KTOI\_EPA\_12\_5\_19.pdf; 345440\_US EPA\_Final\_VC\_Responses\_28May2019.pdf

Julien/Sue/Geoff –

FYI - I informed B.C. today about the attached letter from KTOI (which I previously sent to you) and provided the following email back to B.C.

Let me know if you have any questions,

Jason

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**From:** Gildea, Jason  
**Sent:** Wednesday, January 22, 2020 4:30 PM  
**To:** Hill, Douglas J ENV:EX <Doug.Hill@gov.bc.ca>; Michel Ryan-Aylward <Michel.RyanAylward@gov.bc.ca>; Moore, Sean ENV:EX <Sean.Moore@gov.bc.ca>; Rieberger, Kevin ENV:EX <Kevin.Rieberger@gov.bc.ca>; Paquin, Lisa C ENV:EX <Lisa.Paquin@gov.bc.ca>; Ashcroft, Greg E EAO:EX <Greg.Ashcroft@gov.bc.ca>; Todd.Goodsell@gov.bc.ca; Taylor, Julia X EAO:EX <Julia.X.Taylor@gov.bc.ca>  
**Cc:** Varilek, Kimberly <Varilek.Kimberly@epa.gov>; Schmit, Ayn <Schmit.Ayn@epa.gov>; McGrath, Patricia <m McGrath.patricia@epa.gov>; Kusnierz, Lisa <kusnierz.lisa@epa.gov>  
**Subject:** FW: Request--Michel Coal Draft AIR for Review and Comment by December 13, 2019

FYI – Attaching comments from KTOI on the Michel Coal dAIR comment process.

Additional context in the email below and in the attached response to VC comments (EAO response #6).

Please let me know if you have questions.

Jason

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**From:** Ashcroft, Greg E EAO:EX <Greg.Ashcroft@gov.bc.ca>  
**Sent:** Tuesday, December 03, 2019 3:41 PM  
**To:** Gildea, Jason <Gildea.Jason@epa.gov>  
**Cc:** Taylor, Julia X EAO:EX <Julia.X.Taylor@gov.bc.ca>; Goodsell, Todd EAO:EX <Todd.Goodsell@gov.bc.ca>; Schmit, Ayn <Schmit.Ayn@epa.gov>; McGrath, Patricia <m McGrath.patricia@epa.gov>; Gulbaek-Pearce, Tomesine EMPR:EX <Tomesine.GulbaekPearce@gov.bc.ca>; Squirrell, Colin EMPR:EX <Colin.Squirrell@gov.bc.ca>  
**Subject:** RE: Request--Michel Coal Draft AIR for Review and Comment by December 13, 2019

Hi Jason,

We sent a letter to the CSKT in July, 2019, inviting them to participate in the environmental assessment (EA), but we have not heard back from them. We have not approached the States of Montana or Idaho recently, but in the past couple of years they have declined to participate in EAs.

Kind regards,

Greg

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**From:** Gildea, Jason <Gildea.Jason@epa.gov>

**Sent:** December 3, 2019 2:00 PM

**To:** Ashcroft, Greg E EAO:EX <Greg.Ashcroft@gov.bc.ca>

**Cc:** Taylor, Julia X EAO:EX <Julia.X.Taylor@gov.bc.ca>; Goodsell, Todd EAO:EX <Todd.Goodsell@gov.bc.ca>; Schmit, Ayn <Schmit.Ayn@epa.gov>; McGrath, Patricia <mcgrath.patricia@epa.gov>; Gulbaek-Pearce, Tomesine EMPR:EX <Tomesine.GulbaekPearce@gov.bc.ca>; Squirrell, Colin EMPR:EX <Colin.Squirrell@gov.bc.ca>

**Subject:** RE: Request--Michel Coal Draft AIR for Review and Comment by December 13, 2019

Hi Greg,

I have a follow up question on this email. Did you reach out to affected U.S. tribes (CSKT and KTOI), State of Montana, or State of Idaho regarding review and comment of the Michel Coal Draft AIR? The attached document states, "one or more representatives from state, federal and tribal governmental agencies, as appropriate, will be invited to participate in Working Groups established for its EAs, including CSKT." I don't see any of their emails on the list below.

Thanks for your response,

Jason

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**From:** Ashcroft, Greg E EAO:EX <Greg.Ashcroft@gov.bc.ca>

**Sent:** Wednesday, November 20, 2019 2:41 PM

**To:** NJKapell@ktunaxa.org; Bailey, Brenda EMPR:EX <Brenda.Bailey@gov.bc.ca>; Beddoes, Paul EMPR:EX <Paul.Beddoes@gov.bc.ca>; Constable, Lowell EMPR:EX <Lowell.Constable@gov.bc.ca>; Fradley, Adria N ENV:EX <Adria.Fradley@gov.bc.ca>; Heron-Herbert, Brian ENV:EX <Brian.HeronHerbert@gov.bc.ca>; McConnachie, Jennifer MEM:EX (Jennifer.McConnachie@gov.bc.ca) <IMCEAEX-  
\_o=BCGOVT\_ou=Exchange+20Administrative+20Group+20+28FYDIBOHF23SPDLT+29\_cn=Recipients\_cn=JMCCONNA@Victoria1.gov.bc.ca>; Murphy, Kristen E FLNR:EX <Kristen.Murphy@gov.bc.ca>; Narynski, Heather M EMPR:EX <Heather.Narynski@gov.bc.ca>; Neufeld, Alison ENV:EX <Alison.Neufeld@gov.bc.ca>; Squirrell, Colin EMPR:EX <Colin.Squirrell@gov.bc.ca>; Tepper, Herb FLNR:EX <Herb.Tepper@gov.bc.ca>; kyle.terry@gov.bc.ca; kmorris@ktunaxa.org; Alloisio, Sarah ENV:EX <Sarah.Alloisio@gov.bc.ca>; Corrinne.Gibson@dfo-mpo.gc.ca; al.hodaly@canada.ca; Erika.uchmanowicz@canada.ca; Veale, J Graham ENV:EX <J.Graham.Veale@gov.bc.ca>; Williams, Peter FLNR:EX <Peter.Williams@gov.bc.ca>; Shelley.Ball@canada.ca; jason.cagampan@canada.ca; kcaley@ktunaxa.org; chelsey.cameron@canada.ca; craig.candler@thefirelightgroup.com; Michael.Engelsjord@dfo-mpo.gc.ca; Monique.Gairns@gov.bc.ca; Gildea, Jason <Gildea.Jason@epa.gov>; bgreen@ktunaxa.org; ryan.greville@tc.gc.ca; Gulbaek-Pearce, Tomesine EMPR:EX <Tomesine.GulbaekPearce@gov.bc.ca>; Jackson, Jolene EMPR:EX <Jolene.Jackson@gov.bc.ca>; jjarina@sparwood.ca; jjohnston@sparwood.ca; suzanne.lheureux@tc.gc.ca; kenneth.law@canada.ca; Eric.Leung@tc.gc.ca; blyons@waterlineresources.com; mmachmer@netidea.com; Mauer, Eamon EMPR:EX <Eamon.Mauer@gov.bc.ca>; McGrath, Patricia <mcgrath.patricia@epa.gov>; McLaughlin, Garrett FLNR:EX <Garrett.McLaughlin@gov.bc.ca>; Meili, Sonia EMPR:EX <Sonia.Meili@gov.bc.ca>; Gordon.Moseley@interiorhealth.ca; ann-marie.norris@canada.ca; jpaterson@ktunaxa.org; Peyman, Hurrian ENV:EX <Hurrian.Peyman@gov.bc.ca>; Andrea.Raska@ceaa-acee.gc.ca; Fraser.Ross@Canada.ca; dan@fernier.com; mschalekamp@sparwood.ca; Schmit, Ayn <Schmit.Ayn@epa.gov>; janet.shaw@canada.ca; tanya.shum2@canada.ca; jsinclair@lgl.com; paula.smith2@canada.ca; mike@DirectorAreaA.ca; carolyn.whittaker@thefirelightgroup.com; Katherine.Zmuda@ceaa-acee.gc.ca; Orchard, Trina E ENV:EX <Trina.Orchard@gov.bc.ca>; Fox, Robert ENV:EX <Robert.1.Fox@gov.bc.ca>

**Cc:** Taylor, Julia X EAO:EX <Julia.X.Taylor@gov.bc.ca>; Goodsell, Todd EAO:EX <Todd.Goodsell@gov.bc.ca>

**Subject:** Request--Michel Coal Draft AIR for Review and Comment by December 13, 2019

Dear Working Group Members,

You have received this e-mail because the Environmental Assessment Office (EAO) has you listed as a member of the Working Group for the proposed Michel Coal project. If you have received this e-mail in error or you are no longer the correct representative from your organization for this Working Group, please let me know.

This email signifies the start of a three and a half (3.5) week review period by the Working Group of the draft Application Information Requirements (AIR) for the Michel Coal Project (**dAIR attached**).

#### **What is the AIR?**

The AIR identifies the information that must be provided by the Proponent in their Application for an EA Certificate (Application). The Application must include the requirements set out in the AIR in order to be accepted by EAO for review. The AIR is supported by other documents including:

- The proponent's Valued Components Selection (VC) Document. The VC Document has already received review and comment by the Working Group and the Public and the **most recent version is available on the EAO Sharepoint site**.
- An initial dAIR tracking table with items brought forward from the VC Document review (**attached**).
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- The Proponent's project description available on the EAO's website.
- The Proponent's Consultation Plans for undertaking consultation with Aboriginal Groups and the public. These plans are available on the EAO's website.

#### **Steps in the Working Group Review Period of the draft AIR:**

1. This review period starts today, November 20<sup>th</sup>, and runs until **end of day on December 13<sup>th</sup>**.
2. Please send your comments on the draft AIR **by email to Greg Ashcroft, Todd Goodsell and Julia Taylor**.
3. The EAO will forward your comments to the Proponent, who will compile all of the comments into a tracking table. The EAO will review the changes and responses provided by North Coal and will follow up with individuals and/or the Working Group as necessary.
4. The Working Group will be provided an updated version of the draft AIR and tracking table with proponent responses in a second round of comments prior to EAO finalising the AIR.

#### **Guidance on Submitting Comments on the AIR**

Comments should be specific to the draft AIR. Any requested changes to the draft AIR should be supported by clear rationale (i.e. how the requested change will support the Environmental Assessment of the proposed Project). For your review, please:

1. **Provide your comments in memo or letter format only please.**
2. List in your memo the draft AIR sections that you reviewed.
3. Identify and explain the source(s) of your concern. Possible areas of concerns could be related to the:
  - a. Valued Components (VCs) or the key indicators selected for the proposed Project;
  - b. Appropriateness of study areas or methodology for data collection; and/or
  - c. Any other information required for you to assess the information that will be provided in the Application in terms of potential impacts to valued components, the effectiveness of proposed mitigation measures and significance of any residual effects.
4. Identify what information is needed in the AIR to resolve the concern during the EA such as:

- d. Additional information or analysis for a VC section; and/or
  - e. Specific methodology requirements for data collection for key indicators.
5. If after reviewing the draft AIR you have **no comments, please email Todd, Greg, and Julia** indicating:
- f. Which draft AIR sections that you reviewed; and
  - g. That you do not have any comments or concerns on the draft AIR.

Thank you for your time and efforts for this review.

Kind regards,

Greg

**GREG ASHCROFT**

Project Assessment Officer  
Environmental Assessment Office  
Government of British Columbia  
MOBILE: 250-413-7615



*The EAO respectfully acknowledges that it carries out its work on the traditional territories of Indigenous nations throughout British Columbia.*